

LEVI&KORSINSKY LLP

1101 30th Street NW, Suite 115
Washington, DC 20007
T: 202-524-4290
F: 202-333-2121
www.zlk.com

Adam M. Apton
aapton@zlk.com

April 16, 2020

VIA CM/ECF

The Honorable Valerie E. Caproni
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Grablis v. OneCoin Ltd. et. al.*, Case No. 1:19-cv-4074

Dear Judge Caproni:

We write on behalf of Lead Plaintiff Donald Berdeaux and Plaintiff Christine Grablis (together, “Plaintiffs”) in the above-captioned matter (the “Action”). Earlier this afternoon, we responded to the Court’s Order to Show Cause dated April 10, 2020 (ECF No. 91) explaining why the Court should not dismiss this action for failure to prosecute. In pertinent part, Plaintiffs have invested a significant amount of time and effort into this Action, completed service on all remaining defendants at this time, and are prepared to proceed with the litigation expeditiously.

Provided that the Court allows Plaintiffs to proceed with this matter, Plaintiffs respectfully request that the stay currently in place in this Action be lifted and that the Court schedule a telephonic conference to discuss next steps.

Counsel for Plaintiffs are available at the Court’s convenience.

Respectfully submitted,

s/ Adam M. Apton
Adam M. Apton

cc: All Counsel of Record (via CM/ECF)